

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

CHARLES HADDAD,

Plaintiff,

vs.

Civil Action

No. 04-CV74932

INDIANA PACERS, an assumed name, a/k/a
PACERS BASKETBALL CORPORATION, an
Indiana corporation, JERMAINE O'NEAL and
ANTHONY JOHNSON, Jointly and Severally,

Hon. Anna Diggs Taylor
Mag. Judge Donald A. Scheer

Defendants.

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PLAINTIFF'S INTERROGATORIES TO DEFENDANT ANTHONY JOHNSON

DATED MAY 10, 2005

NOW COME Plaintiffs, by and through their attorneys, **CHARFOOS & CHRISTENSEN, P.C.**, and submit the following Interrogatories to the Defendant Anthony

Johnson, to be answered in writing and under oath within twenty-eight (28) days from receipt hereof.

The information sought must be given, whether secured by you, your agent, your representative, your attorney or any other person who has made this knowledge known to you, or from whom you can get this information, and who is competent to testify as to the facts stated.

These Interrogatories shall be deemed continuing and supplemental answers, if you directly or indirectly obtain further or different information from the time the answers are served to the time of trial.

INTERROGATORIES

INTERROGATORY NO. 1: Regarding general background, please state:

- a. Your full name;
- b. Your date and place of birth;
- c. Your marital status;
- d. Your marital history;
- e. The names, ages, and addresses of your children, if any;
- f. Your present and former residence addresses for the past 15 years, including the dates you resided at each;
- g. Your Social Security number;
- h. Your driver's license State and number; and,
- i. Your height and weight on the date of the incident.

ANSWER:

INTERROGATORY NO. 2: State your educational history, listing:

- a. The name and address of each school attended;
- b. Date of attendance;
- c. Degree conferred or highest class obtained.

ANSWER:

INTERROGATORY NO. 3: State your employment for each of the last 15 years listing each employer beginning with the present or most recent:

- a. The inclusive dates of employment;
- b. The name and address of the employer;
- c. Your occupational title with a brief description of the work performed and the responsibilities involved;
- d. Average gross weekly earnings;
- e. The name of your immediate supervisor, superior, or foreman;
- f. Reason(s) for termination;
- g. Whether a physical examination was required and, if so, give the date, place and person administering same;
- h. Whether you made any representations to the employer regarding your physical condition.

ANSWER:

INTERROGATORY NO. 4: State whether you have ever been convicted or pled guilty of a crime in this State or elsewhere indicating the date, place, nature of offense and sentence received.

ANSWER:

INTERROGATORY NO. 5: Have you made any statements in any form to any person regarding the accident alleged in your Complaint? If so, state:

- a. The name and address of the person who took the statement;
- b. The date the statement was made;
- c. Whether the statement was written, oral, or recorded;
- d. The name and address of the person in possession of the statement, if reduced to writing.

ANSWER:

INTERROGATORY NO. 6: Have you obtained any statements from any persons who were involved in or witnessed the subject accident? If so, state as to each statement:

- a. The name and witness of the person making the statement;
- b. The date the statement was made;
- c. Whether the statement was written, oral, or recorded;
- d. The name and address of the person who took the statement.

ANSWER:

INTERROGATORY NO. 7: State each and every time you have been fined for improper behavior during a basketball game for the past five (5) years of your professional career. For each such incident, please state:

- a. The date the incident occurred.
- b. All players involved in the incident.
- c. All non-players involved in the incident.
- d. The amount of the fine.

ANSWER:

INTERROGATORY NO. 8: State each and every time you have been ejected from a basketball game for improper behavior during for the past five (5) years of your professional career. For each such incident, please state:

- a. The date the incident occurred.
- b. All players involved in the incident.
- c. All non-players involved in the incident.

ANSWER:

CHARFOOS & CHRISTENSEN, P.C.

By: 

L. S. CHARFOOS (P11799)

JASON J. THOMPSON (P47184)

Attorneys for Plaintiff

5510 Woodward Avenue

Detroit, MI 48202

(313) 875-8080

Dated: May 10, 2005

PROOF OF SERVICE

Patricia Cotton, being first duly sworn and deposed, states that on May 10, 2005 she deposited into the United States mail at 5510 Woodward, Detroit, MI a copy of the attached pleadings in an envelope addressed to all counsel of record with sufficient postage prepaid thereon.


